

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Douglas M. Kahler
Lori L. Kahler

Debtor(s)

Legacy Mortgage Asset Trust 2021-GS3

Movant(s)

v.

Douglas M. Kahler
Lori L. Kahler

Respondent(s)

Scott F. Waterman, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 23-12170-PMM

Matter: Motion for Relief from the Automatic Stay

Document No. 42

**DEBTOR(S)' RESPONSE TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Douglas M. Kahler and Lori M. Kahler, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Response to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Upon information and belief, the averment as stated in Paragraph 2 is admitted.
3. Upon information and belief, the averments as stated in Paragraph 3 are admitted.
4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.
5. Admitted.
6. Upon information and belief, the averments as stated in Paragraph 6 are admitted.
7. Upon information and belief, the averments as stated in Paragraph 7 are admitted.
8. Admitted.
9. Admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
10. Admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
11. Upon information and belief, the averments as stated in Paragraph 11 are admitted.
12. Admitted.

13. Paragraph 13 contains a conclusion of law to which no response is required.
14. Paragraph 14 contains a conclusion of law to which no response is required.
15. Paragraph 15 contains a conclusion of law to which no response is required.
16. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 16; therefore, they are denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: November 15, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, November 15, 2023, I served a true and correct copy of the **Debtor(s)' Response to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Michelle McGowan, Esquire
Robertson, Anshutz, Schneid, Crane & Partners, PLLC
13010 Morris Road, Suite 450
Alpharetta, GA 30004
Counsel for Movant(s)

Scott F. Waterman, Esquire
Standing Chapter 13 Trustee
2901 Saint Lawrence Avenue
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Reading, PA 19606

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Philadelphia, PA 19107

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire